

# RONALD SULLIVAN LAW, PLLC

Ronald S. Sullivan Jr.

January 21, 2025

**VIA ECF**

The Honorable Brian M. Cogan  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: *United States v. Mark Nordlicht, et. al Criminal Docket No. 16-640 (BMC)***

Dear Judge Cogan:

This firm represents Mark Nordlicht. We write in response to the Government's Opposition to his Motion to Modify his Conditions of Probation, pursuant to 18 U.S.C. § 3563(c).

Mr. Nordlicht disputes certain assertions made by the Government in their letter, including the claim that his wife requested vacation authorization during his period of home confinement. She did not. Instead, she requested that Mr. Nordlicht join his family after January 16, 2025—a date by which he would have already completed his home confinement sentence.

Nonetheless, Mr. Nordlicht believes it is more constructive to focus on areas of common ground rather than addressing these inaccuracies. Our intent is to avoid unnecessary litigation and to propose a resolution that addresses the concerns of both parties.

After reviewing the Government's response, we propose the attached order for the Court's consideration. We believe this proposed order satisfies the concerns of all parties while ensuring compliance with all necessary requirements. Mr. Nordlicht agrees with the government's proposed accommodation, with the following additions: (1) While the Government proposes that Mr. Nordlicht may travel freely within the Eastern District of New York and the Southern District of New York, the attached proposed order adds the District of Connecticut. During the pre-trial stage, Mr. Nordlicht was permitted to travel throughout the tri-state area and did so without incident or violation. Given the geographic proximity of the New York, New Jersey, and Connecticut, the

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addition of Connecticut is warranted. (2) Mr. Nordlicht requests return of his passport to be used only for international travel approved by the Court and probation. The government's opposition was silent to Mr. Nordlicht's request to return his passport.

Respectfully submitted,

/s/ Ronald Sullivan

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